

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No. 23-cv-81141-MIDDLEBROOKS

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

PREIPO CORP., JOHN A.
MATTERA and DAVID P. GRZAN;

Defendants, and

BOSS GLOBAL ADVISORY
GROUP, INC.,

Relief Defendants.

**SECURITIES AND EXCHANGE COMMISSION’S UNOPPOSED MOTION FOR AN
ORDER DIRECTING THE TURNOVER OF FROZEN OF FROZEN ASSETS AND
TERMINATING ASSET FREEZE AS TO DEFENDANT GRZAN**

Plaintiff/Judgment Creditor, Securities and Exchange Commission (“Commission”), with the consent of Defendant David P. Grzan (the “Parties), moves this Court for an Order directing the turnover of 75% of the frozen funds held by Melanie L. Cyganowski, Esq., in her capacity as Receiver of StraightPath Venture Partners LLC and affiliates (the “Receiver”) to the Commission with the remaining 25% sent to Defendant David P. Grzan (the “Motion”). This agreed upon Motion also seeks terminate the asset freeze against Grzan only.¹ A copy of the parties’ stipulation, which details the procedural history and the parties’ joint consented to

¹ Mr. Grzan’s co-defendant, John Mattera, is currently scheduled to go to trial in the parallel criminal matter on October 14, 2025.

request, as well as a proposed order are attached. The parties respectfully request that the Court grant the Motion consistent with the attached proposed Order.

Local Rule 7.1(a)(2) Certificate of Conferral

I, Michael Roessner, hereby certify that on August 11, 2025, I spoke with Fred Arthur Schwartz counsel for David P. Grzan and he advised that he consented to the relief sought herein.

Date: August 15, 2025

By: s/MICHAEL J. ROESSNER

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